

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AUDREY K. MILLER §
v. §
Plaintiff, § CIVIL ACTION NO.: 4:15-cv-02824
SAM HOUSTON STATE § JURY DEMANDED
UNIVERSITY, *et al,* §
Defendants, §

PLAINTIFF'S EXPERT WITNESS DESIGNATION

Plaintiff AUDREY MILLER, files this Expert Witness Designation in compliance with the Court's Scheduling Order. Further, as discovery is ongoing, Plaintiff reserves the right and intends to supplement these designations.

1. **Terrence B. Robinson, Dania Masood, and Zachary Sanders**
TB Robinson Law Group, PLLC
7500 San Felipe St., Suite 800
Houston, Texas 77063
(713) 568-1723

Mr. Robinson, Ms. Masood, and Mr. Sanders may offer expert opinion testimony regarding the reasonableness, necessity, and amount of attorneys' fees incurred by Plaintiff and Plaintiff's entitlement to these fees under the law. Mr. Robinson and Mr. Sanders may also offer rebuttal testimony to any expert(s) designated by Defendants concerning attorneys' fees.

Generally, these experts will testify that because of Defendants' actions, Plaintiff was required to retain legal counsel and has incurred, and continues to incur, fees and is entitled under

the law to recovery of the reasonable and necessary expenses and fees for the services of his legal counsel.

Mr. Robinson, Ms. Masood, and Mr. Sanders' findings, conclusions, opinions, and testimony will be based upon their background, knowledge, experience, and the time expended on the case, the novelty and difficulty of the questions involved in the case, and any other relevant factors as defined by law. Mr. Robinson, Ms. Masood's, and Mr. Sanders may also base their opinions on all available billing information, as well as the pleadings, discovery and other documents on file or produced in the case.

For information concerning Mr. Robinson, and Mr. Sanders' qualifications, please see the biography attached hereto as **Exhibit A** and **Exhibit B**. Time spent testifying will be paid at the hourly rate set by the Court.

2. **Dr. C. Kent Osborne, MD, Oncologist**
Baylor College of Medicine
Address: 7200 Cambridge St.,
Houston, TX 77030
Phone: (713) 798-1999
Fax: (713) 798-1910

Dr. C. Kent Osborne was Plaintiff's *treating* physician while she worked for SHSU and may offer testimony regarding Plaintiff's overall medical history and mental health during the time she worked for SHSU. For information concerning Dr. Osborne's qualifications, please see the biography attached hereto as **Exhibit C**.

3. **Dr. Dennis Coburn, Ph. D., Psychologist**
Dennis L. Coburn & Associates
Address: 1600 Lake Front Cir., Suite 150
Spring, TX 77380
Phone: (281) 367-5664

Dr. Dennis Coburn is Plaintiff's *treating* Licensed Psychologist and may offer testimony regarding Plaintiff's overall mental health while she was employed by Defendant. For information concerning Dr. Coburn's qualifications, please see the biography attached hereto as **Exhibit D.**

- 4. Dr. Lynn Hungerford, Ph. D.**
Address: 1560 Bay Area Blvd., Suite 150
Friendswood, TX 77546
Phone: (281) 218-7900

Dr. Lynn Hungerford is Plaintiff's *treating* Licensed Psychologist and may offer testimony regarding Plaintiff's overall mental health after she was employed by Defendant. For information concerning Dr. Hungerford's qualifications, please see the biography attached hereto as **Exhibit E.**

- 5. Dr. Alissa Sherry, Ph. D.**
Address: 901 Mopac Expwy S, Bldg. 1, Suite 300,
Austin, TX 78746
Phone: (512) 791-4800

Dr. Alissa Sherry is a licensed psychologist and former Associate Professor at University of Texas at Austin and may offer expert testimony regarding Plaintiff's economic damages due to her being denied tenure with Defendant. Dr. Sherry may also provide testimony on how the Plaintiff being denied the position with Defendant affected Plaintiff's mental state. For information concerning Dr. Sherry's qualifications, please see the Curriculum Vitae and Expert Witness Report attached hereto as **Exhibit F** and **Exhibit G.**

- 6. Dr. Kevin Cahill, Ph. D.**
Address: 223 North 6th Street, Suite 430,
Boise, ID 83702
Phone: (208) 515-3353

Dr. Kevin Cahill is a Senior Economist for ECONorthwest and may offer expert testimony regarding Plaintiff's economic damages due to her being denied tenure with Defendant. Dr. Cahill may also provide testimony on the statistical evaluation for the amount of future earnings that Plaintiff stood to earn had she not been denied tenure. For information concerning Dr. Cahill's qualifications, please see the Curriculum Vitae and Expert Witness Report attached hereto as **Exhibit H** and **Exhibit I**.

- 7. Dr. Laura Brown, Ph. D.**
Address: 3429 Fremont Pl., N. #319,
Seattle, WA 98103
Phone: (206) 633-2405

Dr. Laura Brown is a licensed psychologist and author, who may offer expert testimony regarding the trauma Plaintiff endured due to her being denied tenure with Defendant. For information concerning Dr. Brown's qualifications, please see the Curriculum Vitae and Expert Witness Report attached hereto as **Exhibit J** and **Exhibit K**.

- 8. Dr. Peter Glick, Ph. D.**
Email Address: Glickp@Lawrence.Edu
Phone: (920) 716-4195

Dr. Peter Glick is a licensed psychologist and bias and discrimination expert, who may offer expert testimony regarding the systematic nature of Defendant's discriminatory practices and how Defendant denying her tenure affected her professionally. For information concerning Dr. Brown's qualifications, please see the Curriculum Vitae and Expert Witness Report attached hereto as **Exhibit L** and **Exhibit M**.

GENERAL PROVISIONS

Plaintiff reserves the right to amend and/or supplement this designation with additional designations of experts, if necessary, within the time limits imposed by the Court or any alterations of same by subsequent Order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or Rules of Evidence.

Plaintiff reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at the hearing of this matter, and to designate again same as a consulting expert, who cannot be called by opposing counsel.

Plaintiff may elicit expert testimony from any and all experts or representatives who have been, or may be, designated by or called by Defendants and who the Court allows to testify. This is not a designation of any expert identified by the Defendants who is de-designated or otherwise not permitted to testify.

Plaintiff may call to testify as expert witnesses any and all parties to this lawsuit, or employees, agents, or representatives of such parties. This specifically includes, but is not limited to, all personnel of all the parties, and others who have given or may give depositions or who have been identified in the discovery or documents produced or to be produced in this litigation. In addition, any fact witnesses designated by Defendants may offer expert opinions regarding matters within their knowledge.

Plaintiff reserves the right to call undesignated rebuttal experts whose testimony cannot reasonably be foreseen until the presentation of the evidence.

This designation shall serve to supplement Plaintiff's initial disclosures or any other applicable discovery requests. For each person or entity designated herein, Plaintiff also designates the custodian of records to the extent necessary to make this designation complete.

Plaintiff reserves whatever additional rights they may have with regard to experts, pursuant to the Federal Rules of Civil Procedure and Rules of Evidence, the case law construing same, and rulings of the Court.

Respectfully submitted on this 13th day of May, 20212.

Respectfully Submitted,
TB Robinson Law Group, PLLC



Terrence B. Robinson, Attorney-In-Charge
Fed. Bar No: 14218

Texas Bar No. 17112900

Email: TRobinson@TBRobinsonlaw.com

Zachary Sanders

Fed. Bar No.: 3606552

Texas Bar No.: 24118522

Email: ZSanders@TBRobinsonlaw.com

Dania Masood

Fed. Bar No.: 3574453

Texas Bar No.: 24118459

Email: DMasood@TBRobinsonlaw.com

7500 San Felipe St., Suite 800

Houston, Texas 77063

Telephone: (713) 568-1723

Facsimile: (713) 965-4288

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2022, I served a copy of the foregoing in accordance with the Federal Rules of Civil Procedure.

Melinda J. Wetzel
Texas Bar No. 24115637
Southern District No. 3666447
ATTORNEY-IN-CHARGE
Courtney Corbello
Texas Bar No. 24097533
Southern District No. 3089117
Assistant Attorneys General
Office Of the Attorney General
General Litigation Division
P.O. Box 12548,
Capitol Station Austin, Texas 78711-2548
(512) 463-2120;
(512) 320-0667 FAX
benjamin.dower@oag.texas.gov
mindy.wetzel@oag.texas.gov

ATTORNEYS FOR DEFENDANTS



Terrence B. Robinson